

April 17, 1979



404075

TO: Andrew Hogarth

FROM: Karl Zollner, Jr. *KZ*

SUBJECT: BASF Wyandotte Corporation, Sink Hole Filling

You asked our Section to offer comments on the BASF Wyandotte Corporation's request to be allowed to fill three large sink holes on Grosse Ile. They intend to fill these sink holes with dredge spoils from the River Rouge or Detroit River. You also asked that we comment on permits that might be required.

Based solely on the information provided by the Company we would have to agree with their conclusions that the existing water quality in these sink holes is such that it could not economically be used as a potable water supply or an industrial water supply. The sink holes occurred in areas where the surface 30 feet consisted of industrial solid waste.

Even if there was a concern about protection of groundwater quality in the area, it does not seem that filling the sink holes with dredge spoil would greatly add to the groundwater contamination that would have already occurred when the sink holes were created a number of years ago. In the subsequent years, the water in these holes, contaminated by the previously deposited industrial waste, would have had access to any aquifers that may have been in contact with the sink holes. The filling of these holes should reduce the likelihood of migration of contaminated water, particularly if this spill material is a relatively impervious material as stated or implied in the packet of information furnished by the Company.

An NPDES Permit would have to be issued to authorize the discharge of overflow water to the Detroit River. These overflows will occur as the filling of the sink holes approaches grade. As a minimum, such permits will contain effluent limitations on total suspended solids concentrations. Other limitations on parameters such as hydrogen sulfide may have to be included to protect receiving water quality.

ej

cc: R. Schrameck

RECEIVED

APR 20 1979

PTE. A. GUILLE S.G.A.